

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 21-CR-55 (MJD/LIB)

UNITED STATES OF AMERICA,

Plaintiff,

v.

JARED JOHN FIEGE,

Defendant.

**JOINT MOTION TO EXCLUDE
TIME UNDER THE SPEEDY
TRIAL ACT**

The United States of America, by and through its attorneys, W. Anders Folk, Acting United States Attorney for the District of Minnesota, Lindsey E. Middlecamp, Assistant United States Attorney, together with Defendant Jared John Fiege and his attorney Bruce Rivers, jointly move the Court pursuant to 18 U.S.C. § 3161(h)(7) to exclude time to commence the Defendants' trial under the Speedy Trial Act from May 1, 2021 through July 31, 2021. The grounds for this motion are as follows:

1. This case involves voluminous electronic evidence which has required staggered, continuing disclosures and ongoing forensic analysis. The defense requested that some of the seized electronic devices be flagged for potential taint review to remove attorney-client privileged communications, further extending the time needed for analysis and production to the Defendant.
2. Counsel for the Government and Counsel for the Defendant began communicating about potential terms of resolution via plea in May 2021.

3. With over 20 individual victims and multiple government agency victims entitled to notice and communication related to the resolution of this case, the Government required additional time to discuss resolution prior to circulating a proposed written plea agreement.
4. The parties believe they have reached acceptable terms of resolution and are scheduled for a Change of Plea hearing on July 14, 2021 before this Court.
5. In the event the matter does not resolve on a plea, the parties request that the time between May 1, 2021 and July 31, 2021 be excluded from the calculation of speedy trial deadlines, as the parties will mutually require additional time to prepare for a trial in this matter.
6. Moreover, the parties agree that the COVID-19 Pandemic, General Orders by the District of Minnesota, and corresponding protocols limiting each courthouse to one jury trial at a time, would not have allowed this matter to be scheduled for trial within the originally calculated speedy trial timeline.
7. The parties agree that this proposed exclusion of time serves the interests of the Defendants, the public, and justice in this case, and that such interests outweigh the public and the Defendants' interest in a speedy trial.

Dated: July 8, 2021

Respectfully submitted,

W. ANDERS FOLK
Acting United States Attorney

s/ Lindsey E. Middlecamp
BY: LINDSEY E. MIDDLECAMP
Assistant U.S. Attorney
MN Attorney No. 0392589

s/ Jared John Fiege
Jared John Fiege
Defendant

s/ Bruce Rivers
Bruce Rivers
Attorney for Defendant

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